



Blue Ribbon Committee Report on Key Enhancements to the Oregon Wastewater Permitting Program

Submitted by:

Blue Ribbon Committee on the Oregon Wastewater Permitting
Program

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Executive Summary

The Blue Ribbon Committee (BRC) on the Oregon wastewater permitting program, representing diverse business, municipal, consulting, environmental and community interests from across Oregon, was established by the Oregon Department of Environmental Quality in 2002 to recommend a series of wastewater permitting program enhancements. From December 2002 to May 2004, the BRC conducted an in-depth review of the program, discussed issues and concerns related to permit issuance and compliance, and identified specific program activities and actions needed to strengthen these critical functions. Key areas of concern included the permit backlog (worst in the nation), the growing complexity and size of the permitted universe, and serious resource constraints.

The BRC established the following program vision to guide the program:

“DEQ’s wastewater permitting program improves and protects water quality through timely, predictable, innovative, responsive, and transparent regulation of point sources.”

This report presents the BRC’s key recommendations to enhance the effectiveness and operation of the wastewater permitting program and best protect the quality of Oregon’s waters. The BRC strongly believes the full and expedient implementation of these recommendations as a comprehensive package will enable Oregon to best meet the vision.

○ Watershed-Based Permitting

Watershed-based permitting is the core of the BRC approach to strengthen the wastewater permitting program. This approach includes the following key components:

1. A phased, watershed-based approach to permitting and compliance activities to effect better permit planning and follow up, as well as integration with other water quality programs and activities; and
2. A process for ranking permits for program attention based on environmental significance within each watershed to allow DEQ to focus limited resources appropriately on the full suite of permits.

○ Up-to-Date, Consistent Wastewater Permitting

The BRC recommends a series of actions to improve the timeliness and quality of the permits issued by DEQ. Key elements of the recommendation include the following:

1. A watershed-based permit issuance plan to support improved and timely work planning;
2. Centralized permit policy development expertise to bring focused attention to important policy issues;
3. An explicit process for elevating challenging issues that delay the review/issuance of specific permits; and
4. Use of receipts authority to process off-cycle permit modifications.

○ Sufficient, Appropriate Compliance Touch Points

The BRC supports DEQ having a strong, effective implementation/inspection presence. To ensure this, the BRC recommends that the agency:

1. Establish, implement, and communicate a compliance/inspection plan (based on environmental significance) to support focused, timely, effective compliance/inspection activities;
2. Encourage and support the use of electronic discharge monitoring reports (DMRs), including through the deployment of a new data system (DMS/WADERS); and
3. Review DMRs on a monthly basis and follow up quickly on any anomalies or exceedances.

○ Legislative Actions

The BRC recognizes that the Oregon State Legislature (Legislature) will need to affirm and codify several of its recommendations and encourages the Legislature to adopt appropriate statutory language, provide sufficient resources, and take other necessary steps to fully support this effort.

The BRC understands that additional funding is needed to implement the full range of recommendations and entreats the Legislature take the following specific actions to help ensure that DEQ has adequate resources to implement the full suite of recommendations.

1. Continue to seek and procure wastewater permitting program funding from a variety of sources, including public monies and permit fees (paid by facilities holding wastewater discharge permits).
2. Support appropriately shared permit fee and General Fund increases over the next two biennia, as needed, to support the improved program's needs.

3. Revise the governing statute to allow for collection of annual wastewater program fees. This action can provide much-needed predictability and certainty for both permitted sources and DEQ. Annual fees also reflect the BRC's belief that permit fees should support the program as a whole, rather than any specific function or service for a specific permit.
4. Allow for a modest annual permit fee inflator (not to exceed three percent, generally) to address indirect costs, such as increases in compensation or rising benefits costs.

The BRC also recommends that the Legislature act to remove the state requirement to establish new categories of general permits via rulemaking in order to streamline the use of this valuable tool for dealing with consistent, lower priority discharges.

DEQ Actions

DEQ will have primary responsibility for implementing the program described in this report. The BRC is confident that DEQ is prepared for the task, but feels strongly that the program must demonstrate strong leadership and provide greater accountability to the Legislature, the businesses, and the people of Oregon. The BRC recommends that DEQ establish and report annually on a small number of explicit accountability measures. The annual report—to be sent to the Environmental Quality Commission and the general public—will track the program's progress toward its vision.

The BRC also believes that DEQ's wastewater permitting program must ultimately implement significant structural changes to fully realize the program vision. These include working within the basic framework of the watershed system, establishing and implementing a priority ranking system for identifying which permits receive special program attention, implementing an escalation process to identify and resolve permit issues, and centralizing program policy expertise and decision making.

The actions prescribed by the BRC are designed to strengthen and support DEQ's wastewater permitting program and infrastructure, to focus its work and energies, and ultimately, to ensure that the program is fully equipped to meet the challenge of protecting the quality of Oregon's water bodies for years to come.

NOTE: This report summarizes key discussions and areas of agreement of the Blue Ribbon Committee on wastewater permitting (BRC) and describes major changes the BRC believes are needed to improve the operation of the Oregon wastewater permitting program. The BRC intends for the recommended program enhancements to be implemented as a whole and not in a piecemeal fashion. BRC members believe that full and timely implementation of these recommendations will enable the wastewater permitting program to successfully fulfill its responsibilities under state and federal law to protect Oregon's water quality.

I. Overview

○ Establishing the Blue Ribbon Committee

In fall 2002, the Director of the Oregon Department of Environmental Quality (DEQ) established a “*Blue Ribbon Committee on the Oregon Wastewater Permitting Program*” to provide advice to the agency regarding:

1. Statutory, administrative rule, and/or policy changes to enhance the effectiveness of the program;
2. Innovative program initiatives or directions DEQ may take to make the program more effective;
3. Performance measures by which to assess the effectiveness of the program; and
4. Mechanisms for funding, fee methodologies, and/or other revenue creation to operate the program.

The Blue Ribbon Committee (BRC) is composed of members representing a variety of regulated interests (industrial and municipal), technical/engineering consultants, and environmental and community interests¹ from across the state. Working with DEQ staff over an 18-month period, the BRC conducted an in-depth review of the program, exploring a range of opportunities to strengthen the wastewater permitting program.² The BRC operated at a policy and programmatic level, and did not attempt to determine the specific means of implementing individual strategies/actions. Several discussion papers were prepared for the BRC's consideration (both by the facilitators and DEQ staff) as a way to stimulate and record the BRC's discussions. Many of these are attached as appendices to this report.

¹ Please see Appendix X for a list of Blue Ribbon Committee members and alternates.

² The BRC was aware that EPA was conducting a concurrent review of DEQ's wastewater program and hoped to consider the findings of that review as part of its deliberations. In practice, however, these two efforts had limited opportunities to synchronize. As a result, the EPA program review was not actively factored into the BRC's discussions.

○ Blue Ribbon Committee Perspectives on the State of the Program

The BRC structured its discussions to address a range of concerns raised by BRC members (and others) related to the performance of Oregon’s wastewater permitting program. Chief among the concerns discussed were:

- › DEQ’s national pollutant discharge elimination system (NPDES) major permits backlog is the worst in the nation.
- › Program priorities are not always based on environmental significance.
- › The universe of wastewater permittees (and applicants) and the complexity of permits in Oregon are increasing.
- › Wastewater permits are inconsistently developed and enforced in different (DEQ) regions across the state.
- › Staff are challenged to meet workload demands as state wastewater permitting program resources are limited, while future funding options are expected to become further constrained.
- › It is unclear whether and how DEQ uses facility-reported compliance information (discharge monitoring reports, etc.) and other data to understand the status of specific wastewater permits.
- › Permit and compliance information is not readily available to regulated entities and the public.
- › Wastewater permitting program *[is this the program level you want to focus on?]* leadership appears to be lacking, causing permits and policy decisions to languish.
- › Individual permitting program staff do not appear to be accountable for the quality or delivery of their work.
- › *[Are these correct? Any other concerns to highlight?]*

○ Blue Ribbon Committee Vision for the Wastewater Permitting Program

From its earliest discussions, BRC members expressed support for the wastewater permitting program and a strong desire to strengthen it. The BRC prepared the following vision statement to help guide the wastewater permitting program:

“DEQ’s wastewater permitting program improves and protects water quality through timely, predictable, innovative, responsive, and transparent regulation of point sources.”

The program improvements and restructuring suggestions described in this report are proposed to enable DEQ to fully realize this programmatic vision.

○ Overview of the Report

The program improvements described in this report are organized around three major programmatic building blocks: 1) watershed-based permitting; 2) up-to-date, consistent wastewater permits; and 3) sufficient, appropriate compliance touch points. The following three sections address each of these building blocks in turn and include a discussion of several key elements that help comprise each specific building block. Following these discussions, the report describes specific actions the BRC is asking the Legislature to take—including to provide for full program funding through increased public funding and permit fee changes—as well as actions the BRC asks DEQ to take to fully enact and institutionalize the recommended program enhancements.

II. Key Recommendations

The following sections outline the key strategies and actions that the BRC recommends to strengthen the wastewater permitting program.

○ A. Watershed-Based Permitting

Watershed-based permitting is a five-step cycle to synchronize and integrate permit scoping/planning, data collection, permit issuance, and compliance review/assurance activities within a given geographic area. This approach forms the core of the BRC's recommendations for strengthening the wastewater permitting program's efforts to protect water quality in Oregon. It allows the program to (1) engage with the permittees in a given basin in a coordinated fashion, rather than on a permit-by-permit basis; (2) conduct a permitting process that maximizes environmental benefits and administrative efficiencies; and (3) develop and oversee permit compliance in a given basin in a logical and phased approach, based on environmental significance. The BRC recognizes that watershed-based permitting presents powerful opportunities to incorporate wasteload allocations set by Total Maximum Daily Loads (TMDLs), national effluent limitation guideline requirements, or other water quality requirements into the state-issued wastewater permit.

The BRC recommends that effective implementation of this major building block include the following key elements:

1. **Establish and follow a watershed-based approach to permitting.** Watershed-based permitting is a regular, predictable five-year cycle of activities organized to fully prepare for, develop, issue, and oversee compliance with wastewater permits within a given basin. Coordinating permitting activities within a basin enables DEQ to consider the fullest range of discharge requirements and water quality conditions, and act to maximize water quality benefits. This action also facilitates and encourages greater integration of permitting actions with other critical water quality information, programs, and activities.
2. **Establish a system for ranking permits based on their environmental significance.** The BRC recognizes that DEQ has limited resources to allocate to wastewater permit review. For this reason, the BRC supports allocating wastewater permitting program staff time according to the environmental significance of specific permits. All permits will still be reviewed, issued, and monitored by the program in a timely fashion; those deemed to have the highest environmental significance will be accorded greater scrutiny. Establishing the ranking system within a watershed-based permitting context allows DEQ to further refine how each permit is managed over the course of the five-year cycle.
3. **[others?]**

B. Up-to-Date, Consistent Wastewater Permits

To address concerns related primarily to permit backlogs and a perception of inconsistent (or inadequate) permit requirements across regions within the state, the BRC recommends a series of improvements intended to improve the currency and quality of the wastewater permits DEQ issues. The BRC believes that implementation of the following actions can help ensure that data submitted by permit holders are used in a timely fashion (thereby helping avoid a situation wherein DEQ requests that additional and often costly data be collected) and that permits are issued in a timely manner.

1. **Establish and maintain a watershed-based permit issuance plan.** This recommendation, which builds on the watershed-based permitting recommendations described above, calls for DEQ to establish and follow an explicit workplan and schedule. The BRC believes that establishing and publishing permit issuance plans will help ensure that DEQ stays current with the five-year cycle and thus, will be ready to reissue permits when they expire.
2. **Establish state-wide permit writer tools and trainings.** The BRC recognizes that DEQ has developed (or has begun to develop) several tools that permit writers can use to prepare permits.

Wide deployment of these various tools (e.g., electronic permit writer wizards or permit templates) will enable greater standardization and consistency among permits.

3. Centralize wastewater permit policy development. The BRC believes that centralizing staff resources to establish program policies will bring focused attention to this important activity. A critical follow-on action is to communicate these broader policies to the state regional offices so that they can be consistently enacted across the state. The BRC further recommends that the regulated community and other interested parties be invited to participate in and comment on policy development discussions, as appropriate.

4. Establish an explicit process for ‘elevating’ challenging permit issues/questions that cannot be resolved by a permit writer. One important concern expressed by several BRC members is that DEQ lacks a process for identifying and resolving challenging permit issues. This problem manifests itself through the permit backlog and is related to the perceived lack of centralized permit policy development infrastructure. Establishing an elevation process (in tandem with an action to reinvigorate a centralized policy development infrastructure) should help ensure that permits with difficult policy issues do not languish in the regional offices.

5. Use receipts authority to process off-cycle permit modification requests. The BRC recognizes that the wastewater permitting program must carefully plan—and allocate resources for—permitting activities via the permit issuance plan. Doing so will help ensure that watershed-based permitting can be fully implemented and that program staff are focusing on the permits of greatest environmental significance. The BRC also recognizes, however, that some permit holders not slated for permit re-issuance in a given year may seek to have their permits’ conditions modified. For this reason, the BRC supports the use of receipts authority for DEQ to permit off-cycle permit modifications requested by the permit holder.

6. Explore the possibility of establishing a category of simple permits that allow for minor customization of general permits. The BRC believes that some permits may not fit neatly within a given general permit category but, at the same time, do not require the detailed attention and review as do individual permits. Establishing a simple permit category may enable wastewater permitting staff to provide some additional support and review to these permits without diverting substantial resources from other program activities.

7. [others?]

1 **C. Sufficient, Appropriate Compliance Touch Points³**

2 The BRC strongly endorses DEQ having a solid compliance and inspection program. Compliance
3 activities are an important means for the regulated community to know that they are meeting their permit
4 requirements (or, if not meeting them, what actions are needed to come back into compliance) and for the
5 public to know that the quality of Oregon’s waters are being protected and maintained.

6
7 The BRC’s recommendations for providing sufficient, appropriate compliance opportunities are built
8 around the following key elements:

- 9 **1. Establish and implement a compliance/inspection plan according to environmental**
10 **significance (and aligned, as appropriate, with the watershed cycle).⁴** As with the permit
11 issuance plan discussed above, preparation of a compliance/inspection plan will help ensure that
12 the wastewater permitting program meets its inspection commitments. Several BRC members
13 explicitly request that DEQ continue to conduct annual inspections; others suggest that onsite
14 inspections could be supplemented, and perhaps reduced, by a thorough review of discharge
15 monitoring reports, as discussed below.
- 16 **2. Advance the use of electronic discharge monitoring reports (DMRs) and finalize**
17 **development of their data system (DMS/WADERS)⁵** to allow facilities to submit DMR
18 information electronically. BRC members strongly support the promotion and voluntary use of
19 electronic discharge monitoring reports and encourage DEQ to support the advancement of these
20 technologies.
- 21 **3. Review DMRs on a monthly basis.** The DMS/WADERS system, once implemented and loaded
22 with data, can automatically flag potential permit violations reported in DMRs. DEQ staff can
23 and should follow up quickly and correct any apparent data anomalies/permit violations. For this
24 reason, the BRC believes that the full implementation of this system can introduce much-needed
25 efficiencies and effectiveness into the DMR-review process at DEQ.
- 26 **4. *others?***

³ NOTE: The BRC also supports the development of incentives/efforts to encourage “beyond compliance” behaviors. The BRC discussed some possible strategies but made a deliberate decision during its process to focus on strengthening core program activities. The BRC hopes that the wastewater permitting program can take steps to foster “beyond compliance” behaviors in the near future.

⁴ The Committee acknowledges that DEQ cannot make public all of the details of the inspection plan, especially as they relate to unplanned/surprise facility inspections.

⁵ DEQ is currently trying to secure federal funding to finalize and support initial data entry to the agency’s new compliance data system, DMS/WADERS. The BRC supports DEQ’s efforts and recognizes that this step is important to enabling electronic reporting by facilities and related DMS review improvements.

III. Legislative Actions to Institutionalize and Fund BRC Recommendations

The BRC recognizes that implementation of several of the actions/recommendations identified above will require specific action by the Oregon State Legislature (Legislature). The BRC endorses these actions and requests that the Legislature move in its upcoming 2005 session to enact the recommended changes. Major options from the above discussion that will require legislative action include the following.⁶

- › **Use watershed-based approach to permitting (Recommendation IIA1).** The BRC recommends that the Legislature adopt new statutory language to describe and embrace the watershed-based approach to permitting. Watershed-based permitting is the cornerstone of the BRC's recommendations.
- › **Use receipts authority to process off-cycle permit modification requests (Recommendation IIB5).** The BRC recommends that DEQ consider whether this option requires statutory or regulatory action. If the agency determines that it requires statutory change, the Legislature should adopt statutory language to authorize this. *(NOTE: If DEQ determines that only a regulatory change is needed, the BRC supports this approach as well.)*
- › The BRC also supports **removal of a state requirement to establish a new general permit category via rulemaking** and recommends that the statutory language governing this requirement be modified. The BRC believes that requiring rulemaking to establish a new general permit category is onerous and diverts program resources from other important activities.

○ Program Funding, Permit Fees and Fee Table Structure Modifications

The BRC spent considerable time reviewing the results from a DEQ workload modeling exercise and determined that the wastewater permitting program will require additional resources to fully and successfully enact the recommended program enhancements. Concurrently, the BRC also learned that the wastewater permitting program currently relies to some extent on one-time grant monies, consuming balances, and other sources of revenue that are not easily sustained and has not had a fee or General Fund increase in four [?] years. The BRC recognizes that significant changes in the levels and structure of funding sources may be needed to restore staff positions and bring on the additional staff needed to fully implement the recommendations. The BRC firmly supports efforts to undertake the necessary changes, as described below.

⁶ Appendix X further details implementation pathways and anticipated timing for several of the Committee's recommendations.

1 **Funding Sources**

- 2 › **The BRC recommends that the Legislature continue to support funding the program in**
 3 **essentially the same proportion through a range of funding sources, including public sources**
 4 (40 percent of the current program budget) **and permit fees** (60 percent of the current program
 5 budget). The BRC further recommends that the Legislature endorse this funding strategy via the
 6 biennial state budgeting process. Continued state General Fund funding for the program is
 7 appropriate because the program benefits the general good by helping protect water quality.
 8 Likewise, the BRC believes that permit holders should be required to pay permit fees because it is a
 9 privilege to discharge to the waters of Oregon and facilities should pay to exercise that privilege.
- 10 › The BRC agrees with DEQ's workload modeling exercise that the program will need to add
 11 approximately five additional full time employees (FTE) (beyond current staffing levels) over the
 12 next two biennia to support full implementation of the recommended program. These positions will
 13 support activities related to data management (2006), laboratory and technical expertise (2007), and
 14 policy development (2008). **The BRC asks the Legislature to authorize appropriate additional**
 15 **General Fund expenditures to cover 40 percent of the needed revenues and to authorize permit**
 16 **fee increases over the next two biennia to cover the remaining 60 percent of the needed**
 17 **revenues associated with funding these new positions.**
- 18 › The BRC also supports the Legislature and DEQ in identifying and pursuing any additional sources
 19 of funding to address increased funding needs.

21 **Permit Fee Structure**

22 The BRC understands the need for a reliable, stable program revenue source; the importance of keeping
 23 pace with inflation; and the importance of funding all aspects of the program. The following
 24 enhancements to the permit fee structures relate to these issues.

- 25 › **The BRC recommends that the Legislature replace the current fee collection system with an**
 26 **annual (normalized) wastewater program fee collection system.** Collecting annual fees provides
 27 predictability and certainty (of both costs to the permit holder and cash flow to the program) and
 28 reflects the BRC's belief that fees should generally support the wastewater permitting program. This
 29 modification further underscores an important BRC belief: that the program is not, and should not be,
 30 run as a fee-for-service program.
- 31 › As well, the **BRC further recommends that the wastewater permit fee structure be simplified.**
 32 Simplifying the permit fee structure will bring about greater understanding of how fees are assessed.
 33 The BRC does not have specific suggestions for how to restructure the fee table and is comfortable

asking DEQ to lead this effort. Once a revised fee structure is designed, however, the BRC recommends that the changes be enacted through appropriate legislation.

- › The **BRC recommends that the Legislature allow for inclusion of an annual permit fee inflator** (generally, no greater than three percent) to help address the inevitable increases in indirect costs, including staff salary and benefit increases. Adding an inflator will provide for a sustainable and stable FTE base from which to run the wastewater permitting program.
- › The BRC encourages the Legislature to quickly modify the *Water Quality* statute to reflect these changes and supports DEQ acting to modify the *Regulations Pertaining to NPDES and WPCF Permits* accordingly.

IV. DEQ Actions to Institutionalize BRC Recommendations

The BRC recognizes that successful implementation of its recommendations will rely on solid DEQ management support and leadership, as well as a commitment to ongoing, consistent structural adjustments to the wastewater permitting program infrastructure. This section highlights DEQ’s role in several of the actions.⁷ (*NOTE: Several specific regulatory actions are referred to in Section III, above.*)

○ Program Accountability and Leadership

The BRC appreciates the outstanding efforts and support of the DEQ staff assigned to this project and is confident that DEQ—and in particular, the wastewater permitting program’s leadership—is highly motivated to implement the program vision and the specific recommendations described in this report. At the same time, the BRC believes that the program must strengthen its accountability to the Legislature, the regulated community, and the citizens of Oregon. As a first step, the **BRC strongly recommends that DEQ establish and report on a small number of powerful “primary accountability measures”** related to the three major programmatic building blocks identified above. As a suggested starting point, the BRC developed the following accountability measures:

1. Percent of permits that are on the basin cycle.
2. Percent of permits that are current.
3. Percent of DMR exceedances that are investigated within **X** days.
4. Percent of major/minor/general permittees that receive a compliance inspection each year.

⁷ Appendix X further details implementation pathways and anticipated timing for several of the Committee’s recommendations.

[Q: Do you want to set these as targets or leave it to DEQ to fill in the blanks? Are these the right starting points?]

The BRC recommends that DEQ report on these accountability measures annually to the state Environmental Quality Commission and post the report on the DEQ public website. The BRC recognizes that DEQ, for management purposes, may wish to establish additional accountability measures. The BRC does not intend in any way to limit or constrain the agency’s ability or decision to do so.

○ Improving Program Consistency, Responsiveness, and Transparency

The BRC appreciates and acknowledges DEQ’s recent and ongoing efforts to make permit status and compliance information available on its public website, and supports the agency’s continuing efforts to educate and engage its stakeholders. However, the BRC believes that the wastewater permitting program can and should take additional specific steps to improve the consistency, predictability, and transparency of its actions. Important recommendations related to this include:

1. Establishing and publishing in policy guidance a permit priority ranking based on environmental significance (Recommendation IIA2);
2. Preparing and posting permit issuance and compliance schedules/plans (Recommendations IIB1 and IIC1)⁸; and
3. Preparing and publishing in policy guidance its escalation process (including major timelines/milestones) for resolving permit issues (Recommendation IIB4).

○ Need for Timely and Responsive Service

Finally, the BRC strongly endorses the wastewater permitting program taking specific actions that will enable the program to exemplify two key vision attributes: *timely* and *responsive* regulation of point sources. To fully realize these attributes, the BRC recommends that DEQ enact the following structural changes:

1. Centralize its policy development expertise (Recommendation IIB3);
2. Establish a system to escalate specific policy issues identified by permit writers (Recommendation IIB4);

⁸ The Committee also recommends that DEQ consider including permit issuance and compliance/inspection plans in its Performance Partnership Agreement water quality program commitments.

3. Provide sufficient training and permit writing resources to its staff (Recommendation IIB2);
4. Establish and use the DMS/WADERS system and facilitate migration to e-DMR submittal/review and regularly review those reports (Recommendations IIC2 and 3); and
5. Establish and report annually on accountability measures.

The BRC emphasizes that the success of the wastewater permitting program in the public eye will depend to a great extent on the program's ability to provide these outstanding core services.

V. Closing

The Blue Ribbon Committee on the Oregon wastewater permitting program believes that a strong, effective state-run wastewater permitting program is good for the environment, the economy, and the citizens of Oregon. The BRC recognizes that DEQ's wastewater permitting program is lacking in several regards (e.g., it lacks adequate funding and resources, does not process permits consistently or expediently, and demonstrates inconsistent policy direction and issue resolution), but also believes that the program can and indeed must work effectively. The BRC strongly supports and endorses the program described above and is committed to working with all parties, including the wastewater permitting program and the Legislature, to effect its implementation as a complete package.

The BRC strongly recommends that these program improvements be fully implemented, fully funded, and widely supported by DEQ, the legislators, the businesses, and the citizens of the State of Oregon. With these parties' support, endorsement, and active participation, and with full implementation of the actions and programmatic vision outline in this report, the wastewater permitting program can successfully meet the challenges of protecting Oregon's water quality for years to come.

Appendices

The following appendices build on and supplement the ideas and actions described in the Blue Ribbon Committee report.

○ List of Appendices (not necessarily in any particular order)

Not attached to 5/21 draft

1. Roster of Blue Ribbon Committee members, alternates, and participating DEQ staff
2. Table of issues discussed by (and of interest to) BRC; their ultimate disposition/treatment
3. FTE Phase-in table
4. Possibly, institutionalization table and timeline/status (from May 10, 2004 call summary)
5. DEQ Implementation Approach [?]
6. BRC July 31 Strategies paper (draft) [?]
7. SWOTs paper